

1 ALISON K. BEANUM, State Bar No. 221968
alison.beanum@clydeco.us
2 DOUGLAS J. COLLODEL, State Bar No. 112797
douglas.collodel@clydeco.us
3 CLYDE & CO US LLP
4 355 South Grand Avenue, Suite 1400
Los Angeles, California 90071
5 Telephone: (213) 358-7600
6 Facsimile: (213) 358-7650

7 Attorneys for Defendants
8 BOARD OF TRUSTEES OF THE CALIFORNIA
STATE UNIVERSITY and individual defendants
(see complete list of individual defendants on signature page)
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 CHRISTINE DiBELLA,

14 Plaintiff,

15 v.

16 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY,
17 STEVE RELYEA, Acting Chancellor of
California State University, in his official
18 capacity; JOLENE KOESTER, incoming
Interim Chancellor of California State
19 University, in her official capacity;
JEFFREY D. ARMSTRONG, President of
20 California Polytechnic State University,
San Luis Obispo, in his official capacity;
21 ERIKA D. BECK, President of California
State University, Northridge, in her official
22 capacity; SORAYA M. COLEY, President
of California Polytechnic State University,
23 Pomona, in her official capacity; JANE
CLOSE CONOLEY, President of
24 California State University, Long Beach, in
her official capacity; WILLIAM A.
25 COVINO, President of California State
University, Los Angeles, in his official
26 capacity; THOMAS A. CROPPER,
President of California State University
27 Maritime Academy, in his official capacity;
ADELA DE LA TORRE, President of San
28 Diego State University, in her official

CASE NO. 3:21-cv-08461-TLT

**STIPULATION AND ~~PROPOSED~~ ORDER
SETTING DEADLINE FOR DEFENDANTS
TO RESPOND TO THIRD AMENDED
COMPLAINT**

capacity; GAYLE E. HUTCHINSON, President of California State University, Chico, in her official capacity; TOM JACKSON, JR., President of California Polytechnic State University, Humboldt, in his official capacity; SAÚL JIMÉNEZ-SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; VANYA QUINONES, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; CYNTHIA TENIENTE-MATSON, President of San Jose State University, in his official capacity; MING-TUNG LEE, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel Islands, in his official capacity; LYNNETTE ZELEZNY, President of California State University, Bakersfield, in her official capacity; COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION,

Defendants.

STIPULATION

Plaintiff CHRISTINE DiBELLA (“Plaintiff”), on the one hand, and Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY and individual Defendants

1 (“Defendants,” and together with Plaintiff, the “Parties”) hereby stipulate and request that the
2 deadline for Defendants to file their response to Plaintiff’s Third Amended Complaint (“TAC”)
3 be set at June 7, 2023. This request to continue deadlines is based on the following good cause:

- 4 1. On April 24, 2023, Plaintiff filed a 50-page TAC for Preliminary and Permanent
5 Injunctive Relief, Declaratory Relief, and Damages. Dkt. No. 73.
- 6 2. The TAC names three new defendants: Vanya Quiñones, Cynthia Teniente-
7 Matson, and Ming-Tung Lee,.
- 8 3. Due to the complexity and broad scope of the TAC, Defendants require additional
9 time to investigate the new allegations and prepare their responsive pleadings.
- 10 4. Further, because the newly-named defendants’ responsive pleading deadlines are
11 different than the responsive pleading deadline for the remaining defendants,
12 setting a global deadline allows for a joint filing.
- 13 5. Additionally, Alison Beanum, lead counsel for Defendants, is scheduled to
14 commence trial on May 15, 2023 in the matter of *Agranovich, et al. v. Lynn et al.*,
15 pending in the Superior Court of the State of California, County of Orange, Case
16 No.: 30-2018-01033827, which is anticipated to last three (3) weeks.
- 17 6. Pursuant to the above, the Parties jointly stipulate that a new deadline of June 7,
18 2023 shall be set for Defendants to respond to the TAC.

19 **IT IS SO STIPULATED.**

20 Date: April 27, 2023

PFEIFFER WOLF CAR KANE CONWAY & WISE LLP

21 /s/ Catherine Cabalo, Esq.
22 By CATHERINE CABALO, Esq.
23 Attorneys for Plaintiff
CHRISTINE DiBELLA

24 Date: April 27, 2023

CLYDE & CO US LLP

25 /s/ Alison K. Beanum, Esq.
26 By ALISON K. BEANUM, Esq.
27 Attorney for Defendants
28 BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY and
Individual Defendants

1 **FILER'S ATTESTATION**

2 Pursuant to Local Rule 5-1, I hereby attest that on April 27, 2023, I, Alison Beanum,
3 attorney with Clyde & Co US LLP, received the concurrence of Catherine Cabalo, Esq. in the
4 filing of this document.

5 /s/ Alison K. Beanum
6 Alison K. Beanum
7

8 **~~PROPOSED~~ ORDER**

9 Pursuant to the stipulation of the parties and for good cause shown, the deadline for
10 Defendants to respond to the SAC shall be continued to June 7, 2023.

11 **IT IS SO ORDERED.**

12
13 Dated: April 28, 2023

14 
Honorable Prina L. Thompson
U.S. District Court Judge